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17 *Attorneys for Plaintiff Steven Cohen*

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19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

21 STEVEN COHEN on behalf of himself
22 and all others similarly situated,

23 Plaintiff,

24 v.

25 EP GLOBAL PRODUCTION
26 SOLUTIONS, LLC d/b/a
27 ENTERTAINMENT PARTNERS,

28 Defendant

CASE NO. 2:23-cv-7679

CLASS ACTION

NOTICE OF RELATED CASE

Pursuant to Local Rule 83-1.3.1, Plaintiff in the above-captioned matter (“Cohen”) hereby provide notice of the following related cases currently pending in the Central District of California:

Brenden Smith v. Entertainment Partners, LLC, et al., No. 2:23-cv-06546-CAS-PVC (“Smith”);

Darnisha Goff v. Entertainment Partners, LLC, No. 2:23-cv-06575-CAS-PVC (“Goff”);

William Rhumm. v. EP Global Production Solutions, LLC, et al., No. 2:23-cv-06713-CAS-PVC (“Rhumm”);

Alexis Murphy v. Entertainment Partners, LLC, No. 2:23-cv-06714-CAS-PVC (“Murphy”);

Antionette Staniewicz v. Entertainment Partners, LLC, No. 2:23-cv-06731-CAS-PVC (“Staniewicz”);

Hopelyn Ferguson v. EP Global Production Solutions, LLC, No. 2:23-cv-06732-CAS-PVC (“Ferguson”);

Aimee Levi v. Entertainment Partners, LLC, et al., No. 2:23-cv-06781-CAS(PVCx) (“Levi”);

Janet Dyer v. Entertainment Partners, LLC, et al., No. 2:23-cv-06821-WLH-SSC (“Dyer”);

Victoria Minnich v. EP Global Production Solutions, LLC, No. 5:23-cv-01696-SSS-SHK (“Minnich”); and

Replogle v. EP Global Productions Solutions, LLC, No. 2:23-cv-06941-JLS-JC (“Replogle”)

Civil Local Rule 83-1.3.1 states that actions are related when they appear, *inter alia*:

(a) To arise from the same or a closely related transaction, happening or event; or

1 (b) To call for determination of the same or substantially related or similar
2 questions of law and fact; and

3 (c) For other reasons would entail substantial duplication of labor if heard
4 by different judges.

5 The above cases arise from the same transactions, happenings, and events as
6 the *Cohen* case. The cases also call for determination of the same or substantially
7 similar questions of law and fact. The cases involve a common defendant and arise
8 from the same or substantially similar series of facts. They all allege that Defendant
9 failed to properly secure and safeguard highly valuable, protected personally
10 identifiable information, including names, Social Security numbers and/or tax
11 identification numbers, and mailing addresses. They all allege that Defendant failed
12 to provide adequate notice to Plaintiff and similarly situated class members. The cases
13 present virtually identical questions of law and fact relating to Defendant's knowledge
14 of the conduct.

15 Relating (and consolidating) all of the cases would avoid the duplication of
16 labor, unnecessary costs, and the risk of conflicting results. It would also promote the
17 just and efficient conduct of the cases. Accordingly, Plaintiff respectfully submit that
18 the *Smith, Goff, Rhumm, Murphy, Staniewicz, Ferguson, Levi, Dyer, Minnich and*
19 *Replogle* cases should be related to, and consolidated with, the *Cohen* case.

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1 DATED: September 14, 2023 **PEARSON WARSHAW, LLP**

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By: /s/ Daniel L. Warshaw
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